

**Appl. No.** : **10/612,395**  
**Filed** : **July 2, 2003**

### REMARKS

By the foregoing amendments, Applicants have revised Claim 1, as proposed during the telephone interview, to indicate that events are reported to the event history server by the web server system. This amendment is supported at least by Figure 1 and paragraphs 23 and 24 of the originally-filed application.

This addition to Claim 1 provides a distinction over the two references at issue, Hentzel (U.S. Pat. 6,877,007) and Tamir (U.S. Pub. 2002/0063735), both of which require special tracking/reporting software to be executed on the user's computer to track the browsing events of users. In Hentzel, this special tracking/reporting software is referred to as a "tracking application," and is sent to the user's computer with the requested web page. See Hentzel at col. 3, lines 44-59 (note that the requested web page is augmented with a special script that apparently causes the tracking application to be executed).

In Tamir, the special tracking/reporting software is referred to as a "web display application" or "client application," and apparently needs to be installed on the user's computer. Different web display applications are installed on the user's computer for tracking interactions with different web sites. These applications also customize the display of information for the users, such as by modifying the menu settings on the user's computer. See paragraphs 0008, 0038 and 0113 and Figures 18-20 of Tamir.

Because events are reported to the event history server "by the web server system" in the system of Claim 1, no special client-side tracking/reporting software is required.

Applicants have also amended Claim 1 to clarify that the web server system uses the event data retrieved by the one or more applications via the query interface to personalize web pages in response to page requests from users. As discussed during the interview, Hentzel and Tamir do not disclose this feature.

In view of the foregoing, Applicants submit that Hentzel and Tamir do not teach or suggest all of the limitations of Claim 1, and that the obviousness rejection of Claim 1 is therefore improper.

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Claims 2-13 and 46-50 depend from Claim 1, and are therefore patentable over Hentzel and Tamir for the reasons explained above. In addition, these dependent claims recite additional limitations that are not taught or suggested by Hentzel and Tamir.

For example, with respect to Claim 3, Hentzel and Tamir do not teach or suggest an event history server that “includes at least one storage layer server that stores the event data persistently by user ID, and further includes at least one cache layer server that caches event data of online users.” Applicants respectfully disagree with the Examiner’s assertion that this feature is taught by paragraphs 36 and 59-62 of Tamir. Indeed, Tamir does not even mention the caching of event data.

As another example, Hentzel and Tamir do not teach or suggest the following limitations of Claim 6: “the event history server comprises a plurality of mirrored storage layer servers that persistently store like event data by user ID.” Applicants respectfully disagree with the Examiner’s assertion that this feature is disclosed at col. 8, lines 62-65 of Hentzel. Indeed, nothing in Hentzel suggests using a plurality of mirrored storage layer servers.

As another example, Hentzel and Tamir do not teach or suggest the following limitations of Claims 7 and 8, respectfully: “wherein the query interface of the event history server supports queries of the form ‘has User X accessed URL Y?’” and “wherein the query interface of the event history server supports queries of the form ‘when has User X accessed URL Y?’” In connection with these limitations, the Examiner relies on Tamir’s teaching of an Application Information Record that includes a Client Query Time Interval Field. It is not clear, however, how the Examiner is relying on this teaching of Tamir to arrive at the claim limitations at issue.

As another example, Hentzel and Tamir do not teach or suggest the following limitations of Claim 10: “the event history server records impression event data indicative of specific items presented to users on dynamically generated web pages.” In connection with this claim, the Examiner relies on col. 3, lines 60-65 of Hentzel. Nothing in Hentzel, however, suggests that the web pages at issue are generated dynamically, or that the tracking server records impression event data indicative of specific items presented to users on such web pages.

As yet another example, Hentzel and Tamir do not teach or suggest the following limitations of Claim 48: “wherein the query interface includes functionality for the one or more applications to additionally retrieve the event data based on types of user-selectable display

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elements associated with the events.” The current Office Action does not address these limitations.

The foregoing are merely examples of limitations that are not taught or suggested by Hentzel and Tamir. Other distinctions are recited elsewhere in the claims.

In view of the foregoing, Applicants respectfully submit that the obviousness rejection of Claims 1-13 and 46-50 is improper, and request that the rejection be withdrawn.

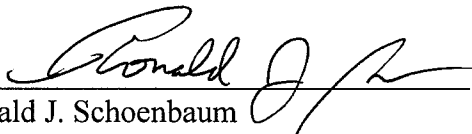
Applicants have also added several new claims to the application, all of which are fully supported by the originally filed application. The new independent method claim closely tracks the language of Claim 1.

If any issues remain which can potentially be resolved by telephone, the Examiner is invited to call the undersigned attorney of record at his direct dial number listed below.

Respectfully submitted,

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